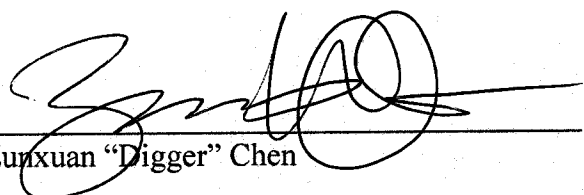


I, Zunxuan "Digger" Chen, declare as follows:

1. I am an attorney in the Dallas office of the law firm of Dentons US, LLP, which represents some of the parties to this Action.
2. I am fluent in both spoken and written Mandarin Chinese as well as English.
3. I assisted in communicating with the Chinese parties represented by my firm, including those now moving to set aside the default judgment.
4. Communications with the Chinese parties were complicated by their unfamiliarity with legal proceedings of this kind and negotiations for them to retain U.S. legal counsel.
5. Communications with the Chinese parties were further complicated by Chinese New Year festivities, which occurred during February 7-13, 2016, and during which time almost all Chinese take off from work and businesses close.
6. Furthermore, our firm needed to communicate through a third party agent in China who located and then established communications with the owners of the domain names that are the subject of this motion. Although these communications were diligently pursued, there were inevitable delays due to communication challenges, time zone differences, and difficulties in conveying the import of the filings before this Court.
7. I am unaware of any bad faith by any party in delaying a response to this case. To the contrary, I believe that, once notified and appreciative of this matter, the Chinese parties did not delay their decision-making to respond before this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2016.


Zunxuan "Digger" Chen